

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TEXARKANA DIVISION**

MAXELL, LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 5:19-cv-0036-RWS

**JURY TRIAL DEMANDED**

**MAXELL, LTD.'S UNOPPOSED MOTION FOR EXPEDITED BRIEFING ON ITS  
OPPOSED MOTION FOR EXTENSION OF TIME TO SUPPLEMENT  
INFRINGEMENT CONTENTIONS PURSUANT TO P.R. 3-1(g)**

Pursuant to Local Rule CV-7(e), Plaintiff Maxell, Ltd. ("Maxell") respectfully requests an expedited briefing schedule with respect to its Opposed Motion for Extension of Time to Supplement Infringement Contentions Pursuant to P.R. 3-1(g) (the "Motion"), which was filed with the Court on March 3, 2020. Maxell requests that any opposition brief be due on March 6, 2020, with no additional briefing from the parties, and no hearing. Apple does not oppose this request.

Expedited briefing is appropriate in view of the fact that Maxell seeks relief from the Court's current deadline of March 13, 2020 for Maxell to supplement its infringement contentions pursuant to P.R. 3-1(g). In the absence of an expedited schedule, briefing on Maxell's Motion would not be complete prior to the March 13 deadline and an order on Maxell's Motion would have no effect. Expedited briefing is further appropriate in view of the fact that the issue presented by Maxell's motion is very narrow.

Accordingly, Maxell requests that the Court order the following expedited briefing schedule concerning Maxell's Motion:

Brief	Due Date
Defendant's Response	March 6, 2020
Maxell's Reply	None to be filed
Defendant's Sur-Reply	None to be filed

Dated: March 3, 2020

By: /s/ Jamie B. Beaber

Geoff Culbertson  
Kelly Tidwell  
Patton, Tidwell & Culbertson, LLP  
2800 Texas Boulevard (75503)  
Post Office Box 5398  
Texarkana, TX 75505-5398  
Telephone: (903) 792-7080  
Facsimile: (903) 792-8233  
gpc@texarkanalaw.com  
kbt@texarkanalaw.com

Jamie B. Beaber  
Alan M. Grimaldi  
Kfir B. Levy  
James A. Fussell, III  
Baldine B. Paul  
Tiffany A. Miller  
Saqib Siddiqui  
Bryan Nese  
William J. Barrow  
Alison T. Gelsleichter  
Clark S. Bakewell  
MAYER BROWN LLP  
1999 K Street, NW  
Washington, DC 20006  
Telephone: (202) 263-3000  
Facsimile: (202) 263-3300  
jbeaber@mayerbrown.com  
agrimaldi@mayerbrown.com  
klevy@mayerbrown.com  
jfussell@mayerbrown.com

bpaul@mayerbrown.com  
tmiller@mayerbrown.com  
ssidiqui@mayerbrown.com  
bnese@mayerbrown.com  
wbarrow@mayerbrown.com  
agelsleichter@mayerbrown.com  
cbakewell@mayerbrown.com

Robert G. Pluta  
Amanda S. Bonner  
MAYER BROWN LLP  
71 S. Wacker Drive  
Chicago, IL 60606  
(312) 782-0600  
rpluta@mayerbrown.com  
asbonner@mayerbrown.com

*Counsel for Plaintiff Maxell, Ltd.*

**CERTIFICATE OF CONFERENCE**

I hereby certify that Plaintiff Maxell, Ltd. has complied with the requirements of Local Rule CV-7(h) governing this case. Specifically, the parties held a telephonic meet and confer on March 3, 2020, attended by lead and local counsel for both parties. Maxell and Apple agreed upon the relief requested by this motion.

/s/ Jamie B. Beaber  
Jamie B. Beaber

/s/ Geoff Culbertson  
Geoff Culbertson

**CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served this 3rd day of March, 2020, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on.

/s/ Jamie B. Beaver  
Jamie B. Beaver